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BEFORE THE  
NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION  
UNITED STATES DEPARTMENT OF TRANSPORTATION

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COMMENTS OF THE  
OWNER-OPERATOR INDEPENDENT DRIVERS ASSOCIATION, INC.

IN RESPONSE TO  
NOTICE REQUESTING COMMENTS

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[NHTSA Docket No. NHTSA-99-5101; Notice 1]

Comments on Truck Splash and Spray Reduction  
for a Report to Congress

DEPT. OF TRANSPORTATION  
OFFICE OF THE SECRETARY  
99 JUN 22 PM 12:08

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June: 21, 1999

**BEFORE THE**  
**FEDERAL HIGHWAY ADMINISTRATION**

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**I. INTRODUCTION**

**A. Procedural Statement**

These comments are submitted by the Owner-Operator Independent Drivers Association, Inc. (“OOIDA” or “Association”) in response to the Notice requesting Comments on Splash and Spray Reduction for a Report to Congress published by the National Traffic Safety Administration (“NHTSA” or “Agency”), Docket No. NHTSA-99-5 10 1- 1 (May 7, 1999).

The notice requesting comments is in response to a directive of the Senate Appropriations Committee for NHTSA to provide Congress with a report updating the agency’s research on truck splash and spray by conducting a comprehensive review and evaluation of spray suppression. measures that can be employed on heavy duty vehicles to provide clearer highway visibility and safety during periods of adverse weather conditions.

**B. Interest of the Owner Operator Independent Drivers Association, Inc.**

The Owner Operator Independent Drivers Association, Inc., is a not-for-pro-fit corporation incorporated in 1973 under the laws of the State of Missouri, with its principal place of business in Grain Valley, Missouri. The more than 40,000 members of OOIDA are small business men and women in all 50 states and Canada who collectively own and operate more than 68,000 individual heavy-duty trucks and small truck fleets. Owner-operators represent nearly half of the total number of Class 7 and 8 trucks operated in the United States. The mailing address of the Association is:

Owner Operator Independent Drivers Association, Inc.  
3 11 R.D. Mize Rd.  
Grain Valley, Missouri 64029  
www.oida.com

OOIDA is the international trade association representing the interests of independent owner-operators and professional drivers on all issues that affect small business truckers.

The Association actively advocates the views of small business truckers through its interaction with state and federal government agencies, legislatures, the courts, other trade associations, and private businesses to advance an equitable environment for commercial drivers. OOIDA is active in all aspects of highway safety and transportation policy, and represents the positions of small business truckers in numerous committees and various forums on the local, state, national, and international levels. The issue of “splash and spray” suppression equipment is important to the operations of small business truckers and commercial drivers including members of OOIDA.

## **II. GENERAL COMMENTS OF THE ASSOCIATION**

The Association is not aware of any new devices that adequately and safely reduce the amounts of splash and spray from the tires of trucks and trailers. Although, we have seen no study showing that the occurrence of splash and spray was a major highway safety problem, it does, in the words used by the Senate and quoted in the Federal Register Notice, create a “stressful” road condition for truck drivers as well as automobile drivers. Road spray creates visibility problems for truck drivers who at times cannot see vehicles behind them cloaked by the spray of their truck. The search for solutions to spray and splash conditions is one of great interest to commercial motor vehicle drivers. The Association has submitted comments to NHTSA as far back as 1985 on this issue and very little has changed since that time (see NHTSA

Docket No. 83-05, May 28, 1985). We would like reiterate some important points and suggest certain issues concerning existing technology that will be important to address before the spray and splash problem will be safely and effectively reduced.

### **1) Effectiveness in Cross Winds**

Most splash and spray suppression reduce only a percentage of tire spray. Devices such as the tire flaps with fringe do reduce the spray that emits directly behind a tire but do not reduce the spray that emits in other directions. Cross winds that frequently accompany rain storms and other inclement weather blow spray around tire flaps and in directions more perpendicular to the direction of the tires. These devices suppress a portion of the spray in calmer weather conditions but present other problems, outlined below, in icy and snowy conditions.

### **2) Ice and Snow Build-up**

A major problem with spray suppression devices is that they can collect large accumulations of ice and snow under the truck. The Association's members fear that a large block of ice behind the steering axle would present several problems. A large clump of ice could effect the handling characteristics of the truck, may jam the steering mechanism, and may dislodge and impact the fuel tanks or line. These circumstances could impair the safe driving of the truck and at a minimum would increase the cost of a truck's maintenance. Furthermore, once a large block of ice and snow were to dislodge from a truck and onto the highway, it could present a safety hazard to other motorists.

The Association estimates that given the significant amount of surface area created by splash and spray suppression devices on which ice and snow may collect, that such an accumulation could easily add up to 1,000 pounds to a truck's weight. Such a weight increase would reduce the efficient operation of a truck and possibly make the vehicle illegally

overweight. This presents a host of additional safety problems associated with overweight trucks.

### III. CONCLUSION

Current splash and spray suppression technology only reduces a fraction of a truck's spray but increases the surface area under a truck upon which snow and ice can collect. Such devices may actually have a negative impact on highway safety that outweighs the minimal spray reduction improvement gained by their use.

OOIDA hopes that splash and spray suppression devices are developed that are effective and do not create more problems than they solve. The cost of the new spray suppression devices can be as much as several hundred dollars per truck and cannot be replaced quickly or easily. Only when it is clearly shown that a device is more effective than problematic should an agency or Congress consider requiring their use.

Thank you for your consideration of these comments.

Respectfully submitted,



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June 21, 1999